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July 19, 2024

VIA ELECTRONIC FILING

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

Re: *CosmoKey Solutions GmbH & Co. KG v. Duo Security, Inc. n/k/a Duo Security LLC and Cisco Systems, Inc.*, C.A. No. 18-1477-JLH-CJB

Dear Judge Burke:

Pursuant to the Court's July 2, 2024 Oral Order, the parties respectfully write to inform the Court that they have narrowed their disputes. The following attorneys met and conferred on July 8, 2024 for approximately 1 hour, and subsequently by email: for Plaintiff, David E. Moore and Andrew L. Brown (Delaware counsel), Scott Weingaertner, John Padro, Matthew Wisnieff, and Timothy Keegan (lead counsel), and for Defendants, Jennifer Ying (Delaware counsel), Brian Rosenthal, Allen Kathir, and Julian Manasse-Boetani (lead counsel).

The Parties discussed the five outstanding discovery disputes: (1) CosmoKey's request for sanctions, and (2) CosmoKey's request to amend the scheduling order; (3) Defendants' request for CosmoKey to supplement its infringement contentions, (4) CosmoKey's request for Defendants to complete their technical document production, and (5) CosmoKey's request that Defendants withdraw three new prior art references in their supplemental invalidity contentions. (*See* D.I. 210 and 225).

The parties have narrowed the second dispute to a single issue, and a stipulation to amend the scheduling order with the parties' competing proposals is being filed concurrently herewith. The parties have narrowed the fourth dispute and have entered into a second stipulation filed concurrently herewith. They are also negotiating alternative solutions to resolve the remaining issues of the fourth dispute. The parties are optimistic that this may eliminate the fourth issue but for now the issue remains disputed until the parties can confirm the feasibility of these alternatives.

Thus, disputes 1, 3, parts of 4, and 5 remain. On dispute 2, the parties have presented their competing provisions on the single remaining issue in FN 2 of the stipulation to amend the scheduling order. The parties are available at the Court's convenience, and very much appreciate the Court's time in addressing these matters.

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Respectfully,

/s/ Andrew L. Brown

Andrew L. Brown

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cc: Counsel of Record (via electronic mail)